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Attorneys for Plaintiff
MICHAEL A. NISKAR

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL A. NISKAR)	Case No.: 2:17-cv-02732-JCM-CWH
)	
Plaintiff,)	STIPULATION TO EXTEND TIME
v.)	TO FILE PLAINTIFF'S MOTION
)	FOR REVERSAL AND/OR REMAND
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security.)	(FIRST REQUEST)
)	
Defendant.)	
)	

Plaintiff Michael A. Niskar and Defendant Nancy A. Berryhill, Acting
Commissioner of Social Security, through their undersigned attorneys, stipulate,
subject to this court's approval, to extend the time by 10 days from March 2, 2018
to March 12, 2018 for Plaintiff to file a motion for reversal and/or remand, with all
other dates in the Court's Order Concerning Review Of Social Security Cases

1 extended accordingly. This is Plaintiff's first request for an extension. This request
2 is made at the request of Plaintiff's counsel to allow additional time to fully
3 research the issues presented. Counsel makes the request due to an abnormally
4 heavy briefing calendar. In the past week, Counsel has had four dispositive
5 motions due. Additionally, Counsel attended a hearing yesterday which
6 unexpectedly kept Counsel away from his office for most of the day, causing a
7 delay in the completion of this motion. Counsel sincerely apologizes for any
8 inconvenience this request may have on the Court and all parties involved.

9 DATE: March 2, 2018

Respectfully submitted,

10 LAWRENCE D. ROHLFING

11 /s/ *Cyrus Safa*

12 BY: _____

Cyrus Safa

13 Attorney for plaintiff Mr. Michael A. Niskar

14 DATE: March 2, 2018

15 DAYLE ELIESON

16 United States Attorney

DEBORAH LEE STACHEL

17 Regional Chief Counsel

18 Social Security Administration

19 /s/ *Michael K. Marriott*

20 BY: _____

Michael K. Marriott

21 Special Assistant United States Attorney

22 Attorneys for defendant Nancy A. Berryhill

|*authorized by e-mail|

24 DATED: March 5, 2018

25 IT IS SO ORDERED: _____

26 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**
2 **FOR CASE NUMBER 2:17-CV-02732-JCM-CWH**

3 I hereby certify that I electronically filed the foregoing with the Clerk of the
4 Court for this court by using the CM/ECF system on March 2, 2018.

5 I certify that all participants in the case are registered CM/ECF users and
6 that service will be accomplished by the CM/ECF system.

7
8 */s/ Cyrus Safa*

9 _____
10 Cyrus Safa
11 Attorneys for Plaintiff
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